## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. : MAGISTRATE NO. 25-1268

CLIFT A. SEFERLIS :

## **AFFIDAVIT**

- 1. I, Pauline Pogorzelski, am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the FBI Philadelphia Division, Philadelphia, Pennsylvania and have been a Special Agent since September 26, 2021. I am currently assigned to a White-Collar Crimes squad where I investigate a variety of matters, including fraud against the government, civil rights violations, and law enforcement corruption. Previously, I worked as a Detective and Police Officer for the Evanston Police Department for approximately 7 years. In those roles, among other responsibilities, I investigated narcotics, firearm-related crime, and other violent offenses.
- 2. I make this affidavit in support of a criminal complaint against Clift A. SEFERLIS ("SEFERLIS") because there is probable cause to believe that on or about May 7, 2025, SEFERLIS knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, a communication, addressed to Victim Jewish Institution 1 in Philadelphia, Pennsylvania, directed to the attention of J.G., a person whose full name is known to me and who was at the time employed at Victim Jewish Institution 1, and containing a threat to physically destroy Victim Jewish Institution 1.

3. This affidavit is based on information I obtained from my personal observations, my training and experience, review of documentary evidence, and information provided to me by other members of the investigation. Because this affidavit is submitted only for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, it does not include all information known to the government as a result of the investigation.

## **PROBABLE CAUSE**

- 4. SEFERLIS is 55-year-old man (date of birth May 29, 1970) whose primary residence is in Garrett Park, Maryland. SEFERLIS claims on social media to be an architectural historian, masonry restoration specialist, and licensed tour guide in Washington, D.C., and New York City. As explained below, SEFERLIS has been the subject of a grand jury investigation into federal crimes that include sending threatening letters to Jewish institutions and their employees, in violation of 18 U.S.C. § 876(c).
- 5. From at least March 1, 2024, through the present, at least 36 threatening mailings (34 letters and 2 postcards) have been transmitted by and through the United States mail to Jewish organizations and entities located in the Eastern District of Pennsylvania and elsewhere, including Victim Jewish Institution 1 and other Jewish institutions located in Washington, D.C.; Fairfax, Virginia; Richmond, Virginia; Arlington, Virginia; Falls Church, Virginia; Rockville, Maryland; and State College, Pennsylvania
- 6. While the letters are not signed, they are sufficiently similar to one another to support an inference that they have all been written by the same person or persons. All of the letters appear to be typewritten from a typewriter with the same print font, size, and spacing, and the addresses on the envelopes containing the letters also appear to be typewritten from a typewriter with the same print font, size, and spacing. Many of the letters refer to Gaza, Israel, or

events in which Jewish people were killed or otherwise attacked, such as the May 22, 2025, fatal shooting of two Israeli Embassy staffers outside the Capital Museum in Washington, D.C., and Kristallnacht, which is a German word for "Night of Broken Glass," and refers to a notoriously violent wave of anti-Jewish attacks that took place in Austria and Germany in November 1938. The letters then suggest that the recipients might become victims of similar acts of violence. The letters are also similar in style, with most containing only a few sentences and/or phrases, often separated by ellipses. At least 25 of the letters have been accompanied by articles cut from the Washington Post newspaper that reference either Israel, Gaza, or other matters relating to Jewish people or Israel. Many of the letters have been addressed to the attention of a specific employee at the Jewish institution and include that person's name.

- 7. The frequency with which these letters and postcards have been mailed has been increasing. On June 3, 2025, a Jewish institution in Washington, D.C. received a threatening letter, which appeared to have been processed through a Philadelphia post office on May 29, 2025. On June 6, 2025, the same institution in Washington, D.C., and another Jewish institution in Washington, D.C. both received threatening letters, which appeared to have been processed through a post office in Brockton, Massachusetts, on June 3, 2025.
- 8. One of the mailings was a typewritten letter, postmarked in Philadelphia,
  Pennsylvania, on May 7, 2025. The envelope was addressed to Victim Jewish Institution 1, to the
  attention of a person with the initials J.G., a person whose full name is known to me and who
  was an employee of Victim Jewish Institution 1 at the time. The letter began, "Hello [J.]" and
  continued:

I just wanted to say you are going to have to be more reliant than ever on your donors.

But at some point that money too will become less and less.

The hatred toward you all, your [institution], and especially the nation of Israel is at an all time high and is only getting worse.

Do you – deep down – reallycare [sic] – really – about what is going on in Gaza?

Will it take something happening to your beloved [institution] to make that happen.

This letter was one of at least seven known mailings that were sent to Victim Jewish Institution 1 since April 1, 2024, which contained a threat to physically destroy the [institution]. Prior to the receipt of the May 7, 2025 mailing, Victim Jewish Institution 1 and its employees had received very similar-looking letters, believed to have been sent by SEFERLIS, which referenced Victim Jewish Institution's "many big open windows," "Kristallnacht," "anger and rage," and a future

9. This morning, during an interview by myself and other federal law enforcement officers, SEFERLIS admitted that he wrote and transmitted numerous threatening letters through the United States mails. SEFERLIS further admitted that he knew his mailings were likely to intimidate and threaten the recipients of those mailings and admitted that was his purpose in transmitting the mailings.

need to "rebuild" the institution following its destruction.

- 10. SEFERLIS also stated that he has given tours of Victim Jewish Institution 1 and was planning to give another such tour on Thursday, June 19, 2025.
- 11. SEFERLIS made these admissions incident to the execution of search warrants for his person, his primary vehicle, his residence, and the primary residence of his husband, R.G., in Kensington, Maryland. The warrants were authorized this weekend by the Honorable Gina L. Simms, United States Magistrate Judge for the District of Maryland.
- 12. SEFERLIS's admissions are corroborated by other evidence, which includes the following:

- a. Fingerprints recovered from two of the envelopes match fingerprints in federal law enforcement files for SEFERLIS, and male DNA has been recovered from two of the envelopes.
- b. SEFERELIS had a subscription to the Washington Post, which was active during at least part, if not all, of the time period when the letters enclosing Washington Post articles were sent to the Jewish institutions. Copies of Washington Post newspapers and articles that had been cut out from newspapers were recovered from his residence during this morning's execution of a search warrant.
- c. Records obtained from Amazon indicate that SEFERLIS purchased Smith-Corona typewriter ribbons on Amazon and had them shipped to the residence of his husband, which is approximately 2.4 miles away from SEFERLIS's primary residence.
- d. A typewriter was recovered from SEFERLIS's residence during the execution of the search warrant.
- e. Records obtained from multiple sources in response to grand jury subpoenas indicate that SEFERLIS frequently has traveled to locations where the letters were received and where the mailings were processed by the United States Postal Service.
- f. More specific records obtained from Google and T-Mobile indicate that SEFERLIS was in locations where the threatening letters and postcards were placed in the U.S. mails on or about the dates when the letters were placed in the mails.

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13. I have spoken with many of the recipients of the threatening mailings, and they have told me that the mailings made them feel intimidated and fearful about their safety.

## **CONLCUSION**

14. Based on the foregoing, I believe that there is probable cause to conclude that the defendant knowingly and willfully deposited in an authorized depository for mail matter, to be sent and delivered by the Postal Service, a communication addressed to Victim Jewish Institution 1 in Philadelphia, Pennsylvania, directed to the attention of J.G., and containing a threat to physically destroy the institution, in violation of 18 U.S.C. § 876(c).

\_/s/ Pauline Pogorzelski\_

Pauline Pogorzelski Special Agent Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 16th Day of June, 2025

HONORABLE SCOTT W. REID
United States Magistrate Judge

Eastern District of Pennsylvania